## BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of	)	
Rules and Regulations Implementing	)	CG-02-386
Minimum Customer Account Record	)	
Exchange Obligations on All Local	)	
and Interexchange Carriers	)	
	)	

## REPLY COMMENTS OF THE IOWA UTILITIES BOARD

On June 1, 2005, the Federal Communications Commission (FCC or Commission) issued a *Further Notice of Proposed Rulemaking in CG Docket No. 02-386; FCC-05-29.* The FCC sought comment on the exchange of customer account information between local exchange carriers (LECs). Specifically, the FCC sought comment on whether all LECs should be required to exchange customer account information to ensure the seamless provision of service and accurate bills as customers transfer their service between local service providers.

The Iowa Utilities Board (Iowa) concurs with the New York State

Department of Public Service (NYPDS), the National Association of State Utility

Consumer Advocates (NASUCA), BellSouth, AT&T, and SBC Communications

Inc. (SBC) in their initial comments that all LECs should be required to participate in the exchange of customer account information.

lowa agrees with NASUCA, BellSouth, AT&T, and SBC that establishing mandatory minimum guidelines would facilitate the smooth transition of customer information between LECs.

NASUCA supports adopting less specific federal rules which would allow the states to adopt more restrictive requirements. Iowa recognizes the efforts and extensive process the NYPDS underwent in developing consensus on guidelines, and their desire not to have mandatory guidelines. However, Iowa would recommend mandatory regulations for all LECs similar to the New York guidelines. Iowa urges the FCC not to preempt the states' regulations and suggests the FCC use existing state regulations as a template in developing mandatory minimum requirements.

Furthermore, states would be in the best position to determine if the impact to small carriers would be burdensome and costly and, therefore, should be allowed to augment the guidelines to tailor the rules for the local markets.

Allowing states to modify the rules for the local markets should protect carrier flexibility.

lowa believes the above is a reasonable approach in minimizing the negative customer impact when customers migrate service between LECs. Iowa joins with the NASUCA, BellSouth, AT&T, and SBC in encouraging the Commission to adopt mandatory minimum guidelines for all LECs. Iowa encourages the Commission not to preempt states' guidelines.

August 1, 2005 Respectfully submitted,

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